Before the

Federal Communications Commission

Washington, DC 20554

January 07, 2002

In the matter of: RM 10352

Comments of M. Robin Critchell, WA6CDR

I support RM-10352. I believe it is time for the Commission to allocate a separate segment in the 1.8 MHz Amateur band for narrow bandwidth transmissions.

Allocating such a segment has the potential to reduce Commission staff workload. Unfortunately, there are some amateurs who do not follow voluntary band plans. With the steadily increasing activity on this Amateur band, conflict between these amateurs and the rest of the community will occur with increasing frequency. The Commission will eventually end up adjudicating these conflicts. Some Commission staff time has already been expended on this issue. Even the amateurs who refuse to recognize voluntary band plans do recognize and adhere to the FCC rules and regulations.

It is time to bring the 1.8 MHz band into conformance with the rest of the amateur bands below 2.3 GHz. The VHF and UHF Amateur bands were originally allocated without any separation of emission bandwidth (or emission type). The Commission noted the increasing activity on these bands and allocated a segment on each for narrow bandwidth emission types. The one band where this was not done (after the band was re-allocated and shrunk), the 222 MHz Amateur band, required subsequent Commission action to allocate such a segment. This occurred after considerable difficulties between amateurs were encountered and brought to the Commissions attention.

I am an active operator on the 1.8 MHz Amateur band. I typically operate from stations on the west coast of the USA, or from one of the nearby southwestern states. Typically, signals from Europe already arrive as weak signals at the east coast of the USA. By the time they get to us on the west coast, they are weak indeed. Signals from Japan and Asia have a very long path to us even though it is over water. These very weak signals can be obliterated by even a small amount of sideband energy from a nearby wider bandwidth signal.

I am also an experienced operator of stations in distant countries. I have participated in a number of overseas operations (DXpeditions). My activities at these stations typically concentrate on the 1.8 MHz band. I have observed that signals I have transmitted from these areas are sometimes not heard or understood due to sideband energy from wider bandwidth stations in the USA covering up my transmissions.

The 1.8 MHz band has more than sufficient space to easily allow for voice (typically SSB) operations even after the 20 percent reduction in available space that this petition requests. Despite this, it may be advisable to allocate a slightly smaller segment that is restricted from voice operations. There are a number of other countries around the world where their entire band allocation is a great deal smaller than ours. Amateurs in those countries desiring to communicate with USA amateurs will end up

operating inside the new narrowband segment at least partially defeating the intent of this petition. It is true that these stations can be communicated with utilizing "split" transmit and receive frequency operation, but this is not typically a desirable situation, and may actually result in increased interference to CW operations. While I personally much prefer the CW mode of operation, I have no desire to excessively restrict the ability of those who choose to operate SSB from accomplishing very long distance communications with the countries having small allocations.

I suggest that an allocation of 1.800 to 1.835 MHz may be sufficient. Many other countries have upper limits of 1.850 MHz. Many of these countries also have a lower limit between 1.810 and 1.825 MHz. Utilizing 1.835 MHz as the segment edge allows for stations in those countries to have a sufficiently large place to operate SSB that is co-incident with USA allocations. Allowing them sufficient space will reduce the need for them to operate SSB in the USA CW segment.

I believe the petitioners erred in requesting 1.843 MHz on the basis of the sidebands from a lower sideband emission occurring on 1.843 MHz. The current Commission rules do not assign a "band edge" based on the "carrier" frequency of an AM or SSB emission. The rules require that an emission be kept within the band allocation. This means that the sidebands must be kept above the assigned edge of the narrow bandwidth segment (or, for that matter, kept wholly within the band allocation, top or bottom).

A lower sideband voice emission of good engineering design can typically be presumed to have modulation components that extend out to 3 KHz below the operating frequency. This means that an amateur wishing to transmit such a lower sideband signal must set his indicated transmit frequency at least 3 KHz above the lower segment edge in order to conform to the rules. Examples are: With a 1.843 MHz segment edge, an SSB operator must set his indicated transmit frequency at 1.846 MHz. With a 1.835 MHz segment edge, that same SSB operator must set his indicated transmit frequency no lower than 1.838 MHz.

I believe it is time to allocate a narrow bandwidth only segment in the 1.8 MHz band, and that the Petitioners have made a good case for requesting that the Commission to do so. My sole disagreement is the minor one of the actual numerical value of the upper edge of the requested segment. I believe I have adequately explained my reasoning.

I urge the Commission to act positively on this petition.

Respectfully submitted

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